

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AKHMED GADZHIEVICH BILALOV, an individual,

Plaintiff,

Docket #: 20-09153(AT)(JW)

- against-

SBERBANK OF RUSSIA PJSC, and DOES 1-100.

Defendants.

**DECLARATION OF IRINA SHPIGEL IN SUPPORT OF PLAINTIFF’S MOTION FOR
LEAVE TO FILE A THIRD AMENDED COMPLAINT**

I, Irina Shpigel declare pursuant to 28 USC §1746 as follows:

1. I am a member of the law firm Shpigel Law, P.C., counsel for Plaintiff Akhmed Bilalov. I make this Declaration in support of Plaintiff’s motion for leave to file a Third Amended Complaint (the “Motion”).
2. Annexed hereto as **Exhibit A** is a true and correct copy of the proposed Amended Complaint.
3. Annexed hereto as **Exhibit B** is a “redline copy” showing the changes between the Second Amended Complaint and the proposed Third Amended Complaint.
4. The proposed Third Amended Complaint (hereinafter the “SAC”) pleads facts in support of Plaintiff’s Malicious Abuse of Process claim and adds one cause of action for Malicious Prosecution.

I declare under perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: October 4, 2022

/s/Irina Shpigel
Irina Shpigel